

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

ANNUAL COMPLIANCE REVIEW, 2015

Docket No. ACR2015

**RESPONSES OF THE UNITED STATES POSTAL SERVICE TO
QUESTIONS 1-20 OF CHAIRMAN'S INFORMATION REQUEST NO. 22**

The United States Postal Service hereby provides its responses to the above-listed questions of Chairman's Information Request No. 22, issued on November 1, 2016. Each question is stated verbatim and followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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1. The Postal Service describes using the zero bundle review to minimize collection delays. Response at 4.
 - a. Please confirm that the Postal Service uses a threshold to determine collection delays based on data from the zero bundle review (such as the number and frequency of zero bundles).
 - b. If confirmed, please describe:
 - i. Each threshold that will trigger remedial action, and
 - ii. The corrective plan triggered by each threshold (specifically, what action is taken to remediate collection delays).
 - c. If the Postal Service does not use a threshold to determine collection failures but intends to develop a threshold, please detail:
 - i. The proposed threshold,
 - ii. The proposed corrective plan triggered by this threshold, and
 - iii. The timeframe for development of this proposed threshold.
 - d. If the Postal Service does not use a threshold based on the Zero Bundle Review data and the Postal Service does not intend to develop a threshold, please detail:
 - i. The obstacles to developing a threshold, and
 - ii. A meaningful alternative means of determining when corrective action is necessary and what that action should be.

RESPONSE

- a. Confirmed.
- b.
 - i. For every instance where preliminary data predict an External First Class (EXFC) measurement system bundle failure, a zero bundle review is required.

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- ii. A zero bundle review involves a thorough investigation to analyze the affected mail flow from collection to cancellation and includes data reports, photographs, training records, all-clear reports, and statements from personnel responsible for affected operations.

Based on the findings of the zero bundle review, appropriate remedial action is taken; the specific action is dependent upon the identified root cause. For example, if an employee is found to have contributed to the failure, appropriate corrective action is taken in accordance with applicable personnel policies and national labor agreements.

- c. N/A

- d. N/A

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2. The Postal Service describes that it generates daily and weekly trend reports related to 24-hour processing clock metrics. *Id.* at 5.
- a. Please confirm that the Postal Service uses a threshold to determine origin processing failure based on data from these reports (such as a particular number and frequency of consecutive reports trending downward).
 - b. If confirmed, please describe:
 - i. Each threshold that will trigger remedial action,
 - ii. How the Postal Service developed each threshold,
 - iii. Whether each threshold differs by postal administrative Area or District, or mail processing facility,
 - iv. The corrective plan triggered by each threshold (specifically what action is taken to remediate this origin processing failure), and
 - v. The level of Postal Service personnel (such as postal administrative Area or District, or mail processing facility leaders) responsible for overseeing the corrective plan.
 - c. If the Postal Service does not use a threshold but intends to develop a threshold, please detail:
 - i. The proposed threshold,
 - ii. The proposed corrective plan triggered by this threshold, and
 - iii. The timeframe for development of this proposed threshold.
 - d. If the Postal Service does not use a threshold to determine origin processing failure based on these reports and the Postal Service does not intend to develop a threshold, please detail:
 - i. The obstacles to developing a threshold of origin processing failure based on these reports, and
 - ii. A meaningful alternative means of determining when corrective action is necessary and what that action should be.

RESPONSE

- a. Confirmed.

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b.

- i. For each of the 24-hour processing clock metrics, there is a national goal. Origin processing failures are determined when a facility fails to meet the goal. Slight variation in performance is expected and therefore upper and lower control limits are calculated based on average performance and standard deviations. When performance is below target and degrades beyond the control limit, remedial action is triggered. National goals are as follows:

- percent cancelled by 2000 = 80 percent
- Outgoing primary cleared by 2400 = 95 percent
- Outgoing secondary cleared by 0030 = 95 percent
- MMP cleared by 1500 = 95 percent
- Mail assigned to Commercial/FedEx by 0230 = 95 percent
- DPS second pass cleared by 0500 = 95 percent
- Carriers returned by 1700 = 87 percent
- Trips on time between 0000-0700 = 88 percent

- ii. Goals were developed based on key operational milestones for mail processing and delivery that occur within a normal 24-hour day. Due to technological improvements, increased visibility, and recent processing trends, the targets are under review for possible revision.

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- iii. Goals are established nationally; however Area and Districts may establish more stringent goals to achieve higher levels of performance.
 - iv. Whenever origin processing failures are detected, the root cause of failure is determined using observations and data analysis and then actions are taken to improve the process. Because the root cause of failure can vary greatly among the different metrics and facilities, each action plan is site-specific.
 - v. The District Manager and/or Plant Manager are responsible for ensuring corrective actions are implemented and action plans/results are communicated to the Area Manager of Operations Support.
- c. N/A
- d. N/A

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3. The Postal Service states that it “uses data from the Mail History and Tracking System (MHTS) to generate and distribute ‘Outgoing Primary/Secondary Clearance’ reports.” *Id.* at 6.
- a. Please confirm that the Postal Service uses a threshold to determine origin processing failure based on these reports (such as a particular number and frequency of consecutive reports trending downward).
 - b. If confirmed, please describe:
 - i. Each threshold that will trigger remedial action,
 - ii. How the Postal Service developed each threshold,
 - iii. Whether each threshold differs by postal administrative Area or District, or mail processing facility,
 - iv. The corrective plan triggered by each threshold (specifically what action is taken to remediate this origin processing failure), and
 - v. The level of Postal Service personnel (such as postal administrative Area or District, or mail processing facility leaders) responsible for overseeing the corrective plan.
 - c. If the Postal Service does not use a threshold to determine collection failures but intends to develop one, please detail:
 - i. The proposed threshold,
 - ii. The proposed corrective plan triggered by this threshold, and
 - iii. The timeframe for development of this proposed threshold.
 - d. If the Postal Service does not use a threshold based on these reports and the Postal Service does not intend to develop a threshold, please detail:
 - i. The obstacles to developing a threshold, and
 - ii. A meaningful alternative means of determining when corrective action is necessary and what that action should be.

RESPONSE

- a. Confirmed.

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b.

- i. Origin processing failures are determined when a facility fails to meet the national goals:
 - Outgoing primary cleared by 2400 = 95 percent
 - Outgoing secondary cleared by 0030 = 95 percent
- ii. The goals were developed based on key operational milestones for mail processing and delivery that occur within a normal 24-hour day. Due to technological improvements, increased visibility, and recent processing trends, the targets are under review for possible revision.
- iii. Goals are established nationally.
- iv. Whenever origin processing failures are detected, the root cause of failure is determined using observations and data analysis and then actions are taken to improve the process. Because the root cause of failure can vary greatly among the different metrics and facilities, each action plan is site-specific.
- v. The District Manager and/or Plant Manager are responsible for ensuring corrective actions are implemented and action plans/results are communicated to the Area Manager of Operations Support.

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c. N/A

d. N/A

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4. The Postal Service states that it promotes timely cancellations and origin processing by reviewing the volume arrival profile. *Id.*
- a. Please confirm that the Postal Service uses a threshold to determine origin processing failure based on the volume arrival profile (such as a particular number and frequency of the volume arrival profiles trending downward).
 - b. If confirmed, please describe:
 - i. Each threshold that will trigger remedial action,
 - ii. How the Postal Service developed each threshold,
 - iii. Whether each threshold differs by postal administrative Area or District, or mail processing facility,
 - iv. The corrective plan triggered by each threshold (specifically what action is taken to remediate this origin processing failure), and
 - v. The level of Postal Service personnel (such as postal administrative Area or District, or mail processing facility leaders) responsible for overseeing the corrective plan.
 - c. If the Postal Service does not use a threshold but intends to develop one, please detail:
 - i. The proposed threshold,
 - ii. The proposed corrective plan triggered by this threshold, and
 - iii. The timeframe for development of this proposed threshold.
 - d. If the Postal Service does not use a threshold and the Postal Service does not intend to develop a threshold, please detail:
 - i. The obstacles to developing a threshold, and
 - ii. A meaningful alternative indicator and threshold.

RESPONSE

- a. Not confirmed.
- b. N/A
- c. N/A

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d.

- i. The volume arrival profile tool provides a dashboard view of the 24-hour clock metrics and other indicators. It displays performance by Area or District and highlights achievement in red or green based on national goals. It is intended to provide a snapshot of performance, but does not trigger remedial action.
- ii. There are other reports that provide 24-hour clock metrics and related performance to national goals. Reports such as the 24-Hour Clock Weekly Trend Report (see ChIR No. 22, Question 2) and MHTS Outgoing Primary/Secondary Clearance reports (see ChIR No. 22, Question 3) provide more actionable information on a local level.

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5. The Postal Service states “[i]n order to meet established clearance times, facilities must ensure that sortation equipment is utilized appropriately; therefore, the ‘Outgoing Machine Utilization vs. RPG report was developed.’” *Id.* at 7.
- a. Please confirm that the Postal Service uses a threshold to determine origin processing failure based on this report (such as a particular number and frequency of the deviations from the RPG plan).
 - b. If confirmed, please describe:
 - i. Each threshold that will trigger remedial action,
 - ii. How the Postal Service developed each threshold,
 - iii. Whether each threshold differs by postal administrative Area or District, or mail processing facility,
 - iv. The corrective plan triggered by each threshold (specifically what action is taken to remediate this origin processing failure), and
 - v. The level of Postal Service personnel (such as postal administrative Area or District, or mail processing facility leaders) responsible for overseeing the corrective plan.
 - c. If the Postal Service does not use a threshold to determine collection failures but intends to develop one, please detail:
 - i. The proposed threshold,
 - ii. The proposed corrective plan triggered by this threshold, and
 - iii. The timeframe for development of this proposed threshold.
 - d. If the Postal Service does not use a threshold and the Postal Service does not intend to develop a threshold, please detail:
 - i. The obstacles to developing a threshold, and
 - ii. A meaningful alternative means of determining when corrective action is necessary and what that action should be.

RESPONSE

- a. Not confirmed.
- b. N/A
- c. N/A

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d.

- i. The Outgoing Machine Utilization vs. RPG report is intended to provide additional data related to clearance time metrics and performance against the projected operating plan. However, given the variation in mail volume, staffing, and machine downtime, there are valid reasons why actual operations would routinely differ from planned performance. Therefore, the report is not used to trigger remedial action, but rather used as a tool to identify opportunities to improve future performance. Depending on circumstances, such improvements may include adjusting start times for employees and/or machines, or adjusting the number of machines used for processing.
- ii. In an effort to enhance visibility and improve RPG compliance, in quarter 4 of FY 2016, a new RPG scorecard report was developed to monitor RPG compliance to run time, throughput, and volume. This new scorecard provides compliance by equipment and all operations. In addition, sites have the ability to track near real-time RPG actual vs. plan during letter processing.

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6. The Postal Service states that service improvement teams are deployed to mail processing plants that do not meet outgoing clearance goals. *Id.* at 9. Please describe:
- a. Each threshold to determine origin processing failure that will trigger remedial action,
 - b. How the Postal Service developed each threshold,
 - c. Whether each threshold differs by postal administrative Area or District, or mail processing facility, and
 - d. The level of Postal Service personnel (such as postal administrative Area or District, or mail processing facility leaders) responsible for overseeing the corrective plan (the deployment of service improvement teams to mail processing facilities that do not meet outgoing clearance goals).

RESPONSE

- a. Sites that failed to achieve service targets are ranked according to their total piece failures, producing a list of the bottom ten sites contributing to service failures. In FY 2015 and early FY 2016, if a site appeared on the "Bottom Ten" report for four or more consecutive weeks, depending upon personnel availability, a service improvement team was created to assist the site. During FY 2016, the expanding use of Informed Visibility (IV) has enabled management to quickly identify specific causes for the service failures, virtually negating the need to send dedicated teams to a site.
- b. The threshold was developed to prioritize the use of resources based upon the total piece failures.
- c. The threshold was developed nationally.

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- d. All findings were documented and an action plan for improvement was developed. The District Manager and Senior Plant Manager were responsible for overseeing the corrective plan. The Area Manager Operations Support was responsible for monitoring progress.

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7. The Postal Service describes a “rapidly expanding” pilot project to use “barcode scanning technology to identify the actual tender and retrieval of mail products from the air carrier locations.” *Id.* at 10.
- a. Please confirm that the Postal Service intends to develop a threshold to determine failed handoffs between the Postal Service and air carriers based on this technology.
 - b. If confirmed, please detail:
 - i. Each proposed threshold (such as a particular number and frequency of failed handoffs between the Postal Service and air carriers that will trigger remedial action),
 - ii. The proposed corrective plan triggered by each threshold, and
 - iii. The timeframe for development of each proposed threshold.
 - c. If the Postal Service does not intend to develop a threshold, please detail:
 - i. The obstacles to developing a threshold, and
 - ii. A meaningful alternative means of determining when corrective action is necessary and what that action should be.

RESPONSE

- a. Confirmed.
- b.
 - i. The Postal Service is proposing to use carrier-specific contractual requirements for on-time performance as the thresholds to monitor against. These are tracked on a weekly basis and remedial action is initiated if failures occur.
 - ii. The first week a threshold is not met triggers a meeting with the supplier to review their performance. The second consecutive week a threshold is missed triggers a follow-up meeting with the supplier during which they are expected to detail a plan for

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improvement. The third consecutive week a threshold is missed triggers removal of the lane from the carrier.

- iii. Thresholds are developed and incorporated into each carrier's contract.

- c. N/A

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8. The Postal Service states that it corrected a defect identified in the Postal Service's review of its Transportation Optimization Planning System software "to ensure that automatically generated routings are service responsive." *Id.* Please detail:
- a. What is meant by "routings [that] are service responsive,"
 - b. How the Postal Service determines if a routing is service responsive, and
 - c. The corrective plan triggered when the Postal Service determines a routing is not service responsive.

RESPONSE

- a. Routings are mail-class specific transportation sequences designed to move the mail from the origin facility to the destination facility. A routing is considered service responsive when the transportation connections result in mail being received at the destination facility prior to the established Critical Entry Time for the particular class of mail such that delivery can be made by the expected delivery date.
- b. The Postal Service calculates the destination receipt date and time based upon the connections in the routing and compares that with the established Critical Entry Time for the particular class of mail, taking into account the appropriate service standard.
- c. When a routing is discovered that is not service responsive, Headquarters and Area Office Transportation Managers review alternative routes available using existing transportation routes to identify a new routing to use. In the event existing transportation does not provide a suitable routing, alternatives including new transportation, changes to the mode

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(air versus surface) of transportation, and re-evaluation of the destinating facility's Critical Entry Time, are evaluated to produce a suitable scenario.

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9. The Postal Service states that "routings are shifted to other providers if poor performance [of contracted air capacity] is demonstrated." *Id.* at 11. Please detail:
- a. The Postal Service's indicator of poor performance by a provider (what measurement system is used to monitor poor performance), and
 - b. Each threshold that will trigger route shifting.

RESPONSE

- a. Each carrier's performance is measured based upon specific criteria as agreed to in the carrier's contract. For instance, data from the Surface Air Support System (SASS) is used to document and track their performance against the contract criteria.
- b. The first week a threshold is not met triggers a meeting with the supplier to review their performance. The second consecutive week a threshold is missed triggers a follow-up meeting with the supplier during which they are expected to detail plans for improvement. The third consecutive week a threshold is missed triggers removal of the lane from the carrier.

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- 10.** The Postal Service describes its efforts to “[a]lign air capacity with product types.”
Id. Please detail:
- a. Each threshold to determine air capacity gaps in the Postal Service network that will trigger remedial action,
 - b. How the Postal Service developed each threshold,
 - c. Whether each threshold differs by postal administrative Area or District, or mail processing facility,
 - d. The level of Postal Service personnel (such as postal administrative Area or District, or mail processing facility leaders) responsible for overseeing the corrective plan (aligning air capacity with product types).

RESPONSE

- a. The Postal Service has developed a shortfall report to compare the available air capacity by product type against the anticipated volume by transportation lane determined by modeling. This report identifies any (zero threshold) gap in the capacity on a daily basis.
- b. The Postal Service determined that a zero threshold would be used for all products in the air capacity to support service targets.
- c. Thresholds do not differ by postal administrative Areas, Districts, or mail processing facilities.
- d. When gaps are identified, the HQ and Area mManagers of transportation are responsible for developing plans to bridge the gaps.

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11. The Postal Service states that it has identified “critical connections in the STC [Surface Transfer Center] network and implemented direct containerization to expedite handling of mail volume through the STC facility.” *Id.* Please describe:
- a. Each threshold to determine transit failure that will trigger remedial action,
 - b. How the Postal Service developed each threshold,
 - c. Whether each threshold differs by postal administrative Area or District, or mail processing facility, and
 - d. The level of Postal Service personnel (such as postal administrative Area or District, or mail processing facility leaders) responsible for overseeing the corrective plan (the direct containerization to expedite handling of mail volume through the STC facility).

RESPONSE

- a. Any mail with a two-day service standard flowing through the STC in a mixed (non-direct) container triggers remedial action.
- b. The Postal Service has established point-to-point transportation, where possible, to remove volume from the STC network for mail with a two-day service standard. Where direct transportation is not feasible, the Postal Service requires direct containers to be built by the origin facility for the two-day destination that is still routed through the STC. Any mail that is not properly containerized jeopardizes service and hence requires corrective action.
- c. The threshold was established nationally for all STCs.
- d. At the STC, the Network Specialist is responsible for identifying the non-direct containerization and alerting the origin office of the failure. At the

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origin facility, the Transportation Manager is responsible for ensuring correct containerization is made for all mail routing through a STC.

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- 12.** The Postal Service states that it “continues to utilize Surface Visibility (SV) scanning and the Transportation Information Management Evaluation System (TIMES) to identify and track late highway contract trips.” *Id.* at 11-12.
- a. Please confirm that the Postal Service uses a threshold to determine transit delays based on these reports (such as a particular number and frequency of late highway contract trips).
 - b. If confirmed, please describe:
 - i. Each threshold that will trigger remedial action,
 - ii. How the Postal Service developed each threshold,
 - iii. Whether each threshold differs by postal administrative Area or District, or mail processing facility,
 - iv. The corrective plan triggered by each threshold (specifically what action is taken to remediate transit delays), and
 - v. The level of Postal Service personnel (such as postal administrative Area or District, or mail processing facility leaders) responsible for overseeing the corrective plan.
 - c. If the Postal Service does not use a threshold but intends to develop one, please detail:
 - i. The proposed threshold,
 - ii. The proposed corrective plan triggered by this threshold, and
 - iii. The timeframe for development of this proposed threshold.
 - d. If the Postal Service does not use a threshold based on transit delays and the Postal Service does not intend to develop a threshold, please detail:
 - i. The obstacles to developing a threshold, and
 - ii. A meaningful alternative means of determining when corrective action is necessary and what that action should be.

RESPONSE

- a. Confirmed.

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b.

- i. Any highway contract route (HCR) that is late more than four hours is considered a Critical Late Trip (CLT). Remedial action is taken if a HCR has more than four CLTs per week.
- ii. The threshold was established based on analysis of historical data to determine when a supplier was habitually late. As performance continues to improve, the Postal Service anticipates lowering the threshold in the future.
- iii. The threshold is applied nationally to all HCRs.
- iv. For HCRs with more than four CLTs per week, the Administration Officer will start the remedial process – Highway Contract Route Administration Corrective Action Steps. The corrective action steps include:
 - Step 1a: Issue PS Form 5500, Report of Contract Route Irregularity;
 - Step 1b: Consult informally with the supplier to correct the problem;
 - Step 2: Hold a formal conference with the supplier;
 - Step 3: Send a certified final request for service improvement letter to the supplier;
 - Step 4: Forward the file with notes and documentation to the Contracting Officer; and
 - Step 5: Contracting Officer sends a final notice to the supplier that satisfactory service must be restored within a

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short period (three days). Only a Contracting Officer can terminate a HCR contract.

- v. Administration Officer and local Senior Plant Manager, as well as the Contracting Officer
- c. N/A
- d. N/A

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- 13.** The Postal Service describes its efforts to develop a STC network optimization model. *Id.* at 12. Please provide a status update on this model's development, including:
- a. A description of the type of data that this model will produce to help identify concentration points where mail can be consolidated,
 - b. A description of the type of data that this model will produce to help reduce overall equipment costs, and
 - c. The expected timeframe for when the model will be fully operational.

RESPONSE

- a. The model is being designed to identify optimal concentration points where mail can be consolidated based on inputs by mail class such as volume, service standards, transportation time and distance.
- b. The model is expected to propose the optimal number of STCs, the location of each STC, and the associated transportation requirements. This optimal output is intended to maximize trips and reduce equipment/trailer costs.
- c. The model is expected to be fully operational by September 2017.

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- 14.** The Postal Service states that it uses the A3 Problem Solving template to analyze transit issues and identify and pilot solutions. *Id.* Please describe:
- a. Each threshold to determine transit failure that triggers use of the A3 Problem Solving template,
 - b. How the Postal Service developed each threshold,
 - c. Whether each threshold differs by postal administrative Area or District, or mail processing facility,
 - d. How the A3 Problem Solving template analyzes transit issues and identifies and pilots solutions, and
 - e. The level of Postal Service personnel (such as postal administrative Area or District, or mail processing facility leaders) responsible for overseeing the corrective plan (transit issues analysis and identification and piloting of solutions based on the A3 Problem Solving template).

RESPONSE

- a. Total failed pieces are utilized as thresholds to determine which origin-destination pairs will need to perform an A3 analysis.
- b. All lanes not meeting service targets are compared based upon their respective total volume failure to identify the 10 lanes with the highest contribution to service failures. These 10 lanes are then required to perform the A3 analysis; however, any transportation lanes may use the A3 analysis to achieve higher levels of performance.
- c. Thresholds do not differ by Postal administrative Areas, Districts, or mail processing facilities.
- d. The A3 problem solving template uses the Lean Management principles to analyze the problem and determine potential solutions. It requires the site to collect data specific to the problem, perform analysis of said data to

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identify potential root causes, review existing operational processes and employees to validate the root causes, potential solutions to resolve the problem, pilot said resolutions, and track the performance changes to determine the effectiveness of the fix.

- e. If an analysis is required due to network capacity shortage, then the HQ Manager of Air Networks is responsible for overseeing the analysis and correction action. If analysis is due to local conditions, then the local Plant Manager is responsible for overseeing the analysis and correction action.

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- 15.** The Postal Service states that “[n]ew CETs [Critical Entry Times] are being implemented during quarter 3 of FY 2016.” *Id.* Please provide the new CETs broken out by product and induction point.

RESPONSE

The CET that changed in quarter 3 of FY 2016 was for 3-5 day First Class packages. The CET in question is for arrival at the destinating facility. In quarter 3, this national CET was changed from 0800 on day 2 to 1800 on day 2.

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- 16.** The Postal Service describes that it is developing the Handling Unit Diagnostic System (HUDS) to better identify potential transit delays. *Id.* at 13.
- a. Please confirm that the Postal Service intends to develop a threshold to determine transit delay based on HUDS.
 - b. If confirmed, please detail:
 - i. The proposed threshold that will trigger remedial action,
 - ii. The proposed corrective plan triggered by this threshold, and
 - iii. The timeframe for development of this proposed threshold.
 - c. If the Postal Service does not intend to develop a threshold, please detail:
 - i. The obstacles to developing a threshold, and
 - ii. A meaningful alternative means of determining when corrective action is necessary and what that action should be.

RESPONSE

- a. Confirmed.
- b.
 - i. Handling units will be matched to the last trip from the origin facility that will arrive prior to the CET at the destination facility for the planned delivery day. The threshold is proposed to be based upon the identification of "At Risk" and "Origin Delay" handling units. A handling unit that is scanned within 30 minutes prior to the trip's departure is deemed "At Risk", while one scanned after the trip's departure is identified as "Origin Delay".
 - ii. Although still in the developmental stage, HUDS data is expected to aid in the prevention of missed transportation which results in

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service failures. "At Risk" handling units will be targeted for expedited movement to platform operations and timely dispatch. Analysis of "Origin Delay" handling units will result in improved processing and mail flow plans to avoid future failures.

- iii. HUDS is planned to be available for operational testing and validation in quarter 2 of FY 2017. Following operational validation and familiarization with the system, the prospered thresholds are expected to be finalized in quarter 3 of FY 2017.

c. N/A

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17. The Postal Service states that “[r]eports from [the Customer Service Daily Reporting System (CSDRS)] provide actionable data for potential remediation or intervention by every level of postal management.” *Id.* at 19.
- a. Please confirm that the Postal Service uses a threshold to determine delivery failure based on CSDRS reports (such as an increase in delayed mail volumes).
 - b. If confirmed, please describe:
 - i. Each threshold (such as the number and frequency of delayed mail volume that will trigger remedial action),
 - ii. How the Postal Service developed each threshold,
 - iii. Whether each threshold differs by postal administrative Area or District, or mail processing facility, and
 - iv. The corrective plan triggered by each threshold (specifically what action is taken to remediate this delayed mail).
 - c. If the Postal Service does not use a threshold but intends to develop one, please detail:
 - i. The proposed threshold,
 - ii. The proposed corrective plan triggered by this threshold, and
 - iii. The timeframe for development of this proposed threshold.
 - d. If the Postal Service does not use a threshold and the Postal Service does not intend to develop a threshold, please detail:
 - i. The obstacles to developing a threshold, and
 - ii. A meaningful alternative means of determining when corrective action is necessary and what that action should be.

RESPONSE

- a. Not confirmed.
- b. N/A
- c. N/A

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TO CHAIRMAN'S INFORMATION REQUEST NO. 22**

d.

- i. No obstacles have been identified.
- ii. The expectation for First-Class Mail delays in CSDRS is zero, but there is no established threshold for remedial action such as number of pieces or occurrences. The system does show “4 like days” and will highlight the current daily piece count in red if it exceeds the “4 like days” figure. Given that First-Class Mail delays are infrequent and relatively small volumes when reported at the individual Post Office level, the Postal Service does not plan to establish specific thresholds for remedial action at this time. In the rare occurrences where larger or more widespread delays occur, the root cause of delays are usually weather related or similar issues beyond the control of the Postal Service. In these cases, postal management is aware and understands the potentially adverse impacts on mail delivery.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 22**

- 18.** The Postal Service states that it uses the MHTS report “to identify trends and/or high amounts of looping pieces for a particular office or carrier route.” *Id.*
- a. Please confirm that the Postal Service uses a threshold to determine delivery failure based on the MHTS report (such as an increase in looping pieces).
 - b. If confirmed, please describe:
 - i. Each threshold (such as the number and frequency of looping pieces that will trigger remedial action),
 - ii. How the Postal Service developed each threshold,
 - iii. Whether each threshold differs by postal administrative Area or District, or mail processing facility, and
 - iv. The corrective plan triggered by each threshold (specifically what action is taken to remediate this failure).
 - c. If the Postal Service does not use a threshold to determine collection failures but intends to develop one, please detail:
 - i. The proposed threshold,
 - ii. The proposed corrective plan triggered by this threshold, and
 - iii. The timeframe for development of this proposed threshold.
 - d. If the Postal Service does not use a threshold and the Postal Service does not intend to develop a threshold, please detail:
 - i. The obstacles to developing a threshold, and
 - ii. A meaningful alternative means of determining when corrective action is necessary and what that action should be.

RESPONSE

- a. Not confirmed.
- b. N/A
- c. N/A

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
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d.

- i. The report is intended as information for local analysis and is not designed to provide automatic alerts to delivery units of high amounts of looping mailpieces.
- ii. The Postal Service does not have an established threshold for MHTS looping pieces for a particular office or carrier route. The MHTS report is used at the Area and District levels as needed based on local criteria, such as a low service score in a particular area or a complaint from a customer. The report is a resource to determine if looping pieces is a contributor or cause of the issue.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 22**

19. The Postal Service states that it uses the MHTS Pre-M tool to “provide[] detail on out-of-sequence errors caused by events during delivery point sequencing.” *Id.*
- a. Please confirm that the Postal Service uses a threshold to determine delivery failure based on the MHTS Pre-M report (such as an increase in out-of-sequence errors).
 - b. If confirmed, please describe:
 - i. Each threshold that will trigger remedial action,
 - ii. How the Postal Service developed each threshold,
 - iii. Whether each threshold differs by postal administrative Area or District, or mail processing facility, and
 - iv. The corrective plan triggered by each threshold (specifically what action is taken to remediate this failure).
 - c. If the Postal Service does not use a threshold but intends to develop one, please detail:
 - i. The proposed threshold,
 - ii. The proposed corrective plan triggered by this threshold, and
 - iii. The timeframe for development of this proposed threshold.
 - d. If the Postal Service does not use a threshold based on the MHTS Pre-M reports and the Postal Service does not intend to develop a threshold, please detail:
 - i. The obstacles to developing a threshold, and
 - ii. A meaningful alternative means of determining when corrective action is necessary and what that action should be.

RESPONSE

- a. Confirmed.
- b.
 - i. Receipt of any notification of a Pre-M error for a delivery unit triggers remedial action.

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- ii. The Postal Service determined that any error identified prior to the carrier leaving for the street should be corrected.
 - iii. The threshold is the same nationwide.
 - iv. The expected result is that the DPS tray will be checked to correct the error prior to delivery.
- c. N/A
- d. N/A

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 22**

- 20.** The Postal Service states that it uses the 3M Case “to return mis-sent, mis-sorted, and mis-sequenced mail found in [mail carriers’ Delivery Point Sequence] volume.” *Id.*
- a. Please confirm that the Postal Service uses a threshold to determine delivery failure (such as an increase in mis-sent, mis-sorted, or mis-sequenced mail).
 - b. If confirmed, please describe:
 - i. Each threshold (such as the number and frequency of mis-sent, sorted, sequenced mail that will trigger remedial action),
 - ii. How the Postal Service developed each threshold,
 - iii. Whether each threshold differs by postal administrative Area or District, or mail processing facility,
 - iv. The corrective plan triggered by each threshold (specifically what action is taken to remediate this failure), and
 - v. The level of Postal Service personnel (such as postal administrative Area or District, or mail processing facility leaders) responsible for overseeing the corrective plan.
 - c. If the Postal Service does not use a threshold to determine collection failures but intends to develop one, please detail:
 - i. The proposed threshold,
 - ii. The proposed corrective plan triggered by this threshold, and
 - iii. The timeframe for development of this proposed threshold.
 - d. If the Postal Service does not use a threshold based on 3M Case data and the Postal Service does not intend to develop a threshold, please detail:
 - i. The obstacles to developing a threshold, and
 - ii. A meaningful alternative means of determining when corrective action is necessary and what that action should be.

RESPONSE

- a. Not confirmed.
- b. N/A

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO CHAIRMAN'S INFORMATION REQUEST NO. 22**

c. N/A

d.

- i. Given the variation in the number of routes and mail volumes across more than 20,000 delivery units, the Postal Service does not plan to establish a threshold for reporting 3M errors beyond the local delivery unit. Delivery unit supervisors record the 3M volume and are aware when anomalies occur, which they communicate to the processing facility for investigation and correction. Due to the expedited processing required to connect 3M volumes to the appropriate carrier or to dispatch volumes on outbound transportation, no additional reporting requirements are planned for 3M volumes.
- ii. The 3M case is intended to prevent delivery failures from occurring. Utilizing the Pre-M report, carriers remove identified errors from their DPS mail prior to leaving the office and the 3M case is used to connect the mailpieces to the proper carrier. If additional errors are found during delivery, the pieces are placed in the 3M case upon return to the office. Supervisors also utilize feedback from carriers to identify recurring issues with specific addresses, which are communicated and investigated.